Alabama Department of Environmental Management

MAJOR SOURCE OPERATING PERMIT

PERMITTEE: ELK CORPORATION OF ALABAMA

FACILITY NAME: ELK CORPORATION ON ALABAMA

FACILITY/PERMIT NO.: 413-0018

LOCATION: TUSCALOOSA, ALABAMA

In accordance with and subject to the provisions of the Alabama Air Pollution Control Act of 1971, as amended, Ala. Code 1975, §§22-28-1 to 22-28-23 (2006 Rplc. Vol. and 2007 Cum. Supp.) (the "AAPCA") and the Alabama Environmental Management Act, as amended, Ala. Code 1975, §§22-22A-1 to 22-22A-15, (2006 Rplc. Vol. and 2007 Cum. Supp.) and rules and regulations adopted thereunder, and subject further to the conditions set forth in this permit, the Permittee is hereby authorized to construct, install and use the equipment, device or other article described above.

*Pursuant to the **Clean Air Act of 1990**, all conditions of this permit are federally enforceable by EPA, the Alabama Department of Environmental Management, and citizens in general. Those provisions which are not required under the **Clean Air Act of 1990** are considered to be state permit provisions and are not federally enforceable by EPA and citizens in general. Those provisions are contained in separate sections of this permit.*

Issuance Date: DRAFT

Effective Date: DRAFT

Expiration Date: October 12, 2021

Alabama Department of Environmental Management

TABLE OF CONTENTS

General Permit Provisos

Federally Enforceable Provisos	Regulations
1. **Transfer**	
This permit is not transferable, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another, except as provided in Rule 335-3-16-.13(1)(a)5.	Rule 335-3-16-.02(6)
2. **Renewals**	
An application for permit renewal shall be submitted at least six (6) months, but not more than eighteen (18) months, before the date of expiration of this permit.	Rule 335-3-16-.12(2)
The source for which this permit is issued shall lose its right to operate upon the expiration of this permit unless a timely and complete renewal application has been submitted within the time constraints listed in the previous paragraph.	
3. **Severability Clause**	
The provisions of this permit are declared to be severable and if any section, paragraph, subparagraph, subdivision, clause, or phrase of this permit shall be adjudged to be invalid or unconstitutional by any court of competent jurisdiction, the judgment shall not affect, impair, or invalidate the remainder of this permit, but shall be confined in its operation to the section, paragraph, subparagraph, subdivisions, clause, or phrase of this permit that shall be directly involved in the controversy in which such judgment shall have been rendered.	Rule 335-3-16-.05(e)
4. **Compliance**	
(a) The permittee shall comply with all conditions of ADEM Admin. Code 335-3. Noncompliance with this permit will constitute a violation of the Clean Air Act of 1990 and ADEM Admin. Code 335-3 and may result in an enforcement action; including but not limited to, permit termination, revocation and reissuance, or modification; or denial of a permit renewal application by the permittee.	Rule 335-3-16-.05(f)
(b) The permittee shall not use as a defense in an enforcement action that maintaining compliance with conditions of this permit would have required halting or reducing the permitted activity.	Rule 335-3-16-.05(g)
5. **Termination for Cause**	
This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by	Rule 335-3-16-.05(h)

Federally Enforceable Provisos	Regulations
the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance will not stay any permit condition.	
6. **Property Rights**	
The issuance of this permit does not convey any property rights of any sort, or any exclusive privilege.	Rule 335-3-16-.05(i)
7. **Submission of Information**	
The permittee must submit to the Department, within 30 days or for such other reasonable time as the Department may set, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon receiving a specific request, the permittee shall also furnish to the Department copies of records required to be kept by this permit.	Rule 335-3-16-.05(j)
8. **Economic Incentives, Marketable Permits, and Emissions Trading**	
No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.	Rule 335-3-16-.05(k)
9. **Certification of Truth, Accuracy, and Completeness:**	
Any application form, report, test data, monitoring data, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.	Rule 335-3-16-.07(a)
10. **Inspection and Entry**	
Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized	Rule 335-3-16-.07(b)

Federally Enforceable Provisos	Regulations
representatives of the Alabama Department of Environmental Management and EPA to conduct the following:	
(a) Enter upon the permittee's premises where a source is located or emissions-related activity is conducted, or where records must be kept pursuant to the conditions of this permit;	
(b) Review and/or copy, at reasonable times, any records that must be kept pursuant to the conditions of this permit;	
(c) Inspect, at reasonable times, this facility's equipment (including monitoring equipment and air pollution control equipment), practices, or operations regulated or required pursuant to this permit;	
(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.	
11. **Compliance Provisions**	
(a) The permittee shall continue to comply with the applicable requirements with which the company has certified that it is already in compliance.	Rule 335-3-16-.07(c)
(b) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.	
12. **Compliance Certification**	
A compliance certification shall be submitted annually by December 12th each year.	Rule 335-3-16-.07(e)
(a) The compliance certification shall include the following:	
(1) The identification of each term or condition of this permit that is the basis of the certification;	
(2) The compliance status;	
(3) The method(s) used for determining the compliance status of the source, currently and over the reporting period consistent with Rule 335-3-16-.05(c) (Monitoring and Recording Keeping Requirements);	

Federally Enforceable Provisos	Regulations
(4) Whether the method(s) or other means used to assure compliance provided continuous or intermittent data; (5) Such other facts as the Department may require to determine the compliance status of the source; (b) The compliance certification shall be submitted to: Alabama Department of Environmental Management Air Division P.O. Box 301463 Montgomery, AL 36130-1463 and to: Air and EPCRA Enforcement Branch EPA Region IV 61 Forsyth Street, SW Atlanta, GA 30303	
13. **Reopening for Cause** Under any of the following circumstances, this permit will be reopened prior to the expiration of the permit: (a) Additional applicable requirements under the Clean Air Act of 1990 become applicable to the permittee with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire. (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into this permit. (c) The Department or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (d) The Administrator or the Department determines that this permit must be revised or revoked to assure compliance with the applicable requirements.	Rule 335-3-16-.13(5)

General Permit Provisos

Federally Enforceable Provisos	Regulations
14. **Additional Rules and Regulations** This permit is issued on the basis of Rules and Regulations existing on the date of issuance. In the event additional Rules and Regulations are adopted, it shall be the permit holder's responsibility to comply with such rules.	§22-28-16(d), Code of Alabama 1975, as amended
15. **Equipment Maintenance or Breakdown**	
(a) In case of shutdown of air pollution control equipment for scheduled maintenance, the intent to shut down shall be reported to the Department at least 24 hours prior to the planned shutdown, unless such shutdown is accompanied by the shutdown of the source which such equipment is intended to control. The Department shall be notified when maintenance on the air pollution control equipment is complete and the equipment is operating.	Rule 335-3-1-.07(1),(2)
(1) Identification of the specific facility to be taken out of service as well as its location and permit number;	
(2) The expected length of time that the air pollution control equipment will be out of service;	
(3) The nature and quantity of emissions of air contaminants likely to occur during the shutdown period;	
(4) Measures such as the use of off-shift labor and equipment that will be taken to minimize the length of the shutdown period;	
(5) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.	
(b) In the event that there is a breakdown of equipment or upset of process in such a manner as to cause, or is expected to cause, increased emissions of air contaminants which are above an applicable standard, the person responsible for such equipment shall notify the Director within 24 hours or the next working day and provide a statement giving all pertinent facts, including the estimated duration of the breakdown. The Director will be notified when the breakdown has been corrected.	

General Permit Provisos

Federally Enforceable Provisos	Regulations
16. **Operation of Capture and Control Devices** All air pollution control devices and capture systems for which this permit is issued shall be maintained and operated at all times in a manner so as to minimize the emissions of air contaminants. Procedures for ensuring that the above equipment is properly operated and maintained so as to minimize the emission of air contaminants shall be established.	§22-28-16(d), Code of Alabama 1975, as amended
17. **Obnoxious Odors** This permit is issued with the condition that, should obnoxious odors arising from the plant operations be verified by Air Division inspectors, measures to abate the odorous emissions shall be taken upon a determination by the Alabama Department of Environmental Management that these measures are technically and economically feasible.	Rule 335-3-1-.08
18. **Fugitive Dust** (a) Precautions shall be taken to prevent fugitive dust emanating from plant roads, grounds, stockpiles, screens, dryers, hoppers, ductwork, etc. (b) Plant or haul roads and grounds will be maintained in the following manner so that dust will be prevented or reduced: (1) By the application of water any time the surface of the road is sufficiently dry to allow the creation of dust emissions by the act of wind or vehicular traffic; (2) By reducing the speed of vehicular traffic to a point below that at which dust emissions are created; (3) By paving; (4) By the application of binders to the road surface at any time the road surface is found to allow the creation of dust emissions; or (5) By any combination of the above methods which results in the prevention of dust becoming airborne from the road surface.	Rule 335-3-4-.02

General Permit Provisos

Federally Enforceable Provisos	Regulations
19. **Additions and Revisions** Any modifications to this source shall comply with the modification procedures in Rules 335-3-16-.13 or 335-3-16-.14.	Rule 335-3-16-.13 and .14
20. **Recordkeeping Requirements** (a) Records of required monitoring information of the source shall include the following: (1) The date, place, and time of all sampling or measurements; (2) The date analyses were performed; (3) The company or entity that performed the analyses; (4) The analytical techniques or methods used; (5) The results of all analyses; and (6) The operating conditions that existed at the time of sampling or measurement. (b) Retention of records of all required monitoring data and support information of the source for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by the permit.	Rule 335-3-16-.05(c)(2)
21. **Reporting Requirements** (a) Reports to the Department of any required monitoring shall be submitted at least every 6 months. All instances of deviations from permit requirements must be clearly identified in said reports. All required reports must be certified by a responsible official consistent with Rule 335-3-16-.04(9). (b) Deviations from permit requirements shall be reported within 48 hours or 2 working days of such deviations,	Rule 335-3-16-.05(c)(3)

Federally Enforceable Provisos	Regulations
including those attributable to upset conditions as defined in the permit. The report will include the probable cause of said deviations, and any corrective actions or preventive measures that were taken.	
22. **Emission Testing Requirements**	
Each point of emission which requires testing will be provided with sampling ports, ladders, platforms, and other safety equipment to facilitate testing performed in accordance with procedures established by Part 60 of Title 40 of the Code of Federal Regulations, as the same may be amended or revised.	Rule 335-3-1-.05(3) and Rule 335-3-1-.04(1)
The Air Division must be notified in writing at least 10 days in advance of all emission tests to be conducted and submitted as proof of compliance with the Department's air pollution control rules and regulations.	
To avoid problems concerning testing methods and procedures, the following shall be included with the notification letter:	
(a) The date the test crew is expected to arrive, the date and time anticipated of the start of the first run, how many and which sources are to be tested, and the names of the persons and/or testing company that will conduct the tests.	Rule 335-3-1-.04
(b) A complete description of each sampling train to be used, including type of media used in determining gas stream components, type of probe lining, type of filter media, and probe cleaning method and solvent to be used (if test procedures requires probe cleaning).	
(c) A description of the process(es) to be tested including the feed rate, any operating parameters used to control or influence the operations, and the rated capacity.	
(d) A sketch or sketches showing sampling point locations and their relative positions to the nearest upstream and downstream gas flow disturbances.	
A pretest meeting may be held at the request of the source owner or the Air Division. The necessity for such a meeting and the required attendees will be determined on a case-by-case basis.	Rule 335-3-1-.04

Federally Enforceable Provisos	Regulations
All test reports must be submitted to the Air Division within 30 days of the actual completion of the test unless an extension of time is specifically approved by the Air Division.	
23. **Payment of Emission Fees**	
Annual emission fees shall be remitted each year according to the fee schedule in ADEM Admin. Code r. 335-1-7-.04.	Rule 335-1-7-.04
24. **Other Reporting and Testing Requirements**	
Submission of other reports regarding monitoring records, fuel analyses, operating rates, and equipment malfunctions may be required as authorized in the Department's air pollution control rules and regulations. The Department may require emission testing at any time.	Rule 335-3-1-.04(1)
25. **Title VI Requirements (Refrigerants)**	
Any facility having appliances or refrigeration equipment, including air conditioning equipment, which use Class I or Class II ozone-depleting substances as listed in 40 CFR Part 82, Subpart A, Appendices A and B, shall service, repair, and maintain such equipment according to the work practices, personnel certification requirements, and certified recycling and recovery equipment specified in 40 CFR Part 82, Subpart F. No person shall knowingly vent or otherwise release any Class I or Class II substance into the environment during the repair, servicing, maintenance, or disposal of any device except as provided in 40 CFR Part 82, Subpart F. The responsible official shall comply with all reporting and recordkeeping requirements of 40 CFR 82.166. Reports shall be submitted to the US EPA and the Department as required.	40 CRR Part 82
26. **Chemical Accidental Prevention Provisions**	
If a chemical listed in Table 1 of 40 CFR Part 68.130 is present in a process in quantities greater than the threshold quantity listed in Table 1, then: (a) The owner or operator shall comply with the provisions in 40 CFR Part 68. (b) The owner or operator shall submit one of the following:	40 CFR Part 68

Federally Enforceable Provisos	Regulations
(1) A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR Part 68 § 68.10(a) or, (2) A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan.	
27. **Display of Permit** This permit shall be kept under file or on display at all times at the site where the facility for which the permit is issued is located and will make the permit readily available for inspection by any or all persons who may request to see it.	Rule 335-3-14-.01(1)(d)
28. **Circumvention** No person shall cause or permit the installation or use of any device or any means which, without resulting in the reduction in the total amount of air contaminant emitted, conceals or dilutes any emission of air contaminant which would otherwise violate the Division 3 rules and regulations.	Rule 335-3-1-.10
29. **Visible Emissions** Unless otherwise specified in the Unit Specific provisos of this permit, any source of particulate emissions shall not discharge more than one 6-minute average opacity greater than 20% in any 60-minute period. At no time shall any source discharge a 6-minute average opacity of particulate emissions greater than 40%. Opacity will be determined by 40 CFR Part 60, Appendix A, Method 9, unless otherwise specified in the Unit Specific provisos of this permit.	Rule 335-3-4-.01(1)
30. **Fuel-Burning Equipment** (a) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.03.	Rule 335-3-4-.03
(b) Unless otherwise specified in the Unit Specific provisos of this permit, no fuel-burning equipment may discharge sulfur dioxide emissions in excess of the emissions specified in Part 335-3-5-.01.	Rule 335-3-5-.01
31. **Process Industries – General**	

Federally Enforceable Provisos	Regulations
Unless otherwise specified in the Unit Specific provisos of this permit, no process may discharge particulate emissions in excess of the emissions specified in Part 335-3-4-.04.	Rule 335-3-4-.04
32. **Averaging Time for Emission Limits** Unless otherwise specified in the permit, the averaging time for the emission limits listed in this permit shall be the nominal time required by the specific test method.	Rule 335-3-1-.05
33. **Compliance Assurance Monitoring (CAM)** Conditions (a) through (d) that follow are general conditions applicable to emissions units that are subject to the CAM requirements. Specific requirements related to each emissions unit are contained in the unit specific provisos and the attached CAM appendices.	
(a) Operation of Approved Monitoring	40 CFR 64.7
(1) Commencement of operation. The owner or operator shall conduct the monitoring required under this section and detailed in the unit specific provisos and CAM appendix of this permit (if required) upon issuance of the permit, or by such later date specified in the permit pursuant to §64.6(d).	
(2) Proper maintenance. At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.	
(3) Continued operation. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner	

Federally Enforceable Provisos	Regulations
or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. (4) Response to excursions or exceedances. (a) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. (b) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.	

Federally Enforceable Provisos	Regulations
(5) Documentation of need for improved monitoring. After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Department and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.	
(b) Quality Improvement Plan (QIP) Requirements	40 CFR 64.8
(1) Based on the results of a determination made under Section 33(a)(4)(b) above, the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with 40 CFR §64.6(c)(3), the permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices.	
(2) Elements of a QIP:	
A. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.	
B. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for	

Federally Enforceable Provisos	Regulations
conducting one or more of the following actions, as appropriate: (i) Improved preventive maintenance practices. (ii) Process operation changes. (iii) Appropriate improvements to control methods. (iv) Other steps appropriate to correct control performance. (v) More frequent or improved monitoring (only in conjunction with one or more steps under paragraphs (2)(b)(i) through (iv) above). (3) If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Department if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. (4) Following implementation of a QIP, upon any subsequent determination pursuant to Section 33(a)(4)(b) above, the Department may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: A. Failed to address the cause of the control device performance problems; or B. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. (5) Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act.	
(c) Reporting and Recordkeeping Requirements	40 CFR 64.9

Federally Enforceable Provisos	Regulations
(1) General reporting requirements A. On and after the date specified in Section 33(a)(1) above by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with ADEM Admin. Code r. 335-3-16-.05(c)3. B. A report for monitoring under this part shall include, at a minimum, the information required under ADEM Admin. Code r. 335-3-16-.05(c)3. and the following information, as applicable: (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and (iii) A description of the actions taken to implement a QIP during the reporting period as specified in Section 33(b) above. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. (2) General recordkeeping requirements. A. The owner or operator shall comply with the recordkeeping requirements specified in ADEM Admin. Code r. 335-3-16-.05(c)2.. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to Section 33(b) above and any activities undertaken to implement a quality	

Federally Enforceable Provisos	Regulations
improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). B. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	
(d) Savings Provisions	40 CFR 64.10
(1) Nothing in this part shall: A. Excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. The requirements of this part shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purpose of determining the monitoring to be imposed under separate authority under the Act, including monitoring in permits issued pursuant to title I of the Act. The purpose of this part is to require, as part of the issuance of a permit under title V of the Act, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of this part. B. Restrict or abrogate the authority of the Department to impose additional or more stringent monitoring, recordkeeping, testing, or reporting requirements on any owner or operator of a source under any provision of the Act, including but not limited to sections	

Federally Enforceable Provisos	Regulations
114(a)(1) and 504(b), or state law, as applicable. C. Restrict or abrogate the authority of the Department to take any enforcement action under the Act for any violation of an applicable requirement or of any person to take action under section 304 of the Act.	
34. **Permit Shield**	
(b) A permit shield exists under this operating permit in accordance with ADEM Admin. Code 335-3-16-.10 in that compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that such applicable requirements are included and are specifically identified in this operating permit.	Rule 335-3-16-.10
(c) Nothing in this permit shall alter or affect the following: (1) The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; (2) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Act; or (4) The ability of EPA to obtain information from a source pursuant to Section 114 of the Act.	

Summary Page for Shingle Manufacturing Line 1

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 5-1	Coater	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 5-1	Coater	PAH	0.0002 lb/ton of asphalt roofing product manufactured	§63.11561(b), Table 2
EP 5-1	Coater	Opacity	See General Provisos	Rule 335-3-4-.01(1)
Fugitive	Horizontal Coating Mixer, Sealant Applicator, and Adhesive Applicator	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Shingle Manufacturing Line 1

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2.	These sources are subject to the applicable requirements of 40 CFR 63, Subpart AAAAAAA, "National Emissions Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing".	40 CFR Part 63 Subpart AAAAAAA
Emission Standards		
1.	Particulate matter emissions from these units shall not exceed the allowable set by Rule 335-3-4-.04.	Rule 335-3-4-.04
2.	PAH emissions from the Coater (EP 5-1) shall not exceed 0.0002 lb/ton of asphalt roofing product manufactured.	40 CFR §63.11561(b), Table 2
Compliance and Performance Test Methods and Procedures		
1.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3.	Method 18 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of PAH emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	The Permittee must develop and make available for inspection a site-specific monitoring plan. The plan must specify the process parameters established during the initial compliance assessment and how they are being monitored and maintained to demonstrate continuous compliance.	40 CFR §63.11563(g)
2.	The Permittee shall continuously (at least once every 15 minutes) monitor the coater asphalt temperature and coater asphalt throughput. The coater asphalt temperature and coater asphalt throughput shall be reduced to 3-hour averages. The 3-hour averages shall be less than the 3-hour average established in the most recent compliance test. Corrective action must be performed within (2) two hours if the coater asphalt temperature or coater asphalt throughput exceed the limits established in the most recent compliance test. Any repairs or observed problems shall be recorded.	40 CFR §63.11563(g)

Federally Enforceable Provisos		Regulations
3.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 15% are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
4.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-16-.05(c)
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)

Summary Page for Filler Production

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 6-1	Roller Mill 1 with Baghouse	PM	0.44 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 6-1	Roller Mill 1 with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)
EP 6-2	Roller Mill 2 with Baghouse	PM	0.44 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 6-2	Roller Mill 2 with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)
EP 6-3	Three (3) Limestone Storage Silos with Baghouse	PM	0.22 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 6-3	Three (3) Limestone Storage Silos with Baghouse	Opacity	1%	§60.472(d)
Fugitive	Truck Unloading, Belt Conveyor 1 & 2 Transfer Points, & Rock Storage Tank	Opacity	1%	§60.472(d)

Provisos for Filler Production

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
3. These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 60 Subpart UU
Emission Standards	
1. The Three (3) Limestone Storage Silos with Baghouse (EP 6-3), Truck Unloading (Fug-1), Belt Conveyor 1 & 2 Transfer Points (Fug-2 & Fug-3) and Rock Storage Tank (Fug-4) shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d)
2. Particulate matter emission from the Roller Mill 1 with Baghouse (EP 6-1) shall not exceed 0.44 lb/hr.	Rule 335-3-14-.04 (Anti-PSD)
3. Particulate matter emission from the Roller Mill 2 with Baghouse (EP 6-2) shall not exceed 0.44 lb/hr.	Rule 335-3-14-.04 (Anti-PSD)
4. Particulate matter emission from the Three (3) Limestone Storage Silos with Baghouse (EP 6-3) shall not exceed 0.22 lb/hr.	Rule 335-3-14-.04 (Anti-PSD)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos		Regulations
2.	If visible emissions in excess of 10% are noted from Roller Mill 1 (EP 6-1) and/or Roller Mill 2 (EP 6-2), maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
3.	If any visible emissions are observed from the Three (3) Limestone Storage Silos with Baghouse (EP 6-3), Truck Unloading (Fug-1), Belt Conveyor 1 & 2 Transfer Points (Fug-2 & Fug-3) and Rock Storage Tank (Fug-4)), maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
4.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
5.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-16-.05(c)
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Line 1 Filler Handling System

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 7-1	Filler Silo with Baghouse	PM	0.36 lbs/hr or the allowable set by 335-3-4-.04	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
EP 7-1	Filler Silo with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)
EP 7-2	Daybin with Baghouse	PM	0.36 lbs/hr or the allowable set by 335-3-4-.04	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
EP 7-2	Daybin with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)
EP 7-3	Rotary Kiln with 4.7 MMBtu/hr Burner with Baghouse	PM	0.46 lbs/hr or the allowable set by 335-3-4-.04	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
EP 7-3	Rotary Kiln with 4.7 MMBtu/hr Burner with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Line 1 Filler Handling System

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
3.	For particulate matter emissions, the Rotary Kiln with Baghouse (EP 7-3) is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64
Emission Standards		
1.	Particulate matter emissions from the Filler Silo with Baghouse (EP 7-1) shall not exceed the lesser of 0.36 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
2.	Particulate matter emissions from the Daybin with Baghouse (EP 7-2) shall not exceed the lesser of 0.36 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
3.	Particulate matter emissions from the Rotary Kiln with Baghouse (EP 7-3) shall not exceed the lesser of 0.46 lbs/hr or the allowable set by Rule 335-3-4-.04.	Rule 335-3-14-.04 (Anti-PSD) & Rule 335-3-4-.04
Compliance and Performance Test Methods and Procedures		
1.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64
2.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 10% are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos		Regulations
3.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
4.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differential across the Filler Silo with Baghouse (EP 7-1) & Daybin with Baghouse (EP 7-2) shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-16-.05(c)
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Line 1 Granule Handling and Storage

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 8-1	Line 1 Truck Unloading with Baghouse	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-1	Line 1 Truck Unloading with Baghouse	Opacity	1%	§60.472(d)
EP 8-2	Line 1 Truck Bucket Elevator with Baghouse	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-2	Line 1 Truck Bucket Elevator with Baghouse	Opacity	1%	§60.472(d)
EP 8-3	Line 1 Railcar Bucket Elevator with Baghouse	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-3	Line 1 Railcar Bucket Elevator with Baghouse	Opacity	1%	§60.472(d)
EP 8-4	Line 1 Headlap Silo with Bin Vent	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-4	Line 1 Headlap Silo with Bin Vent	Opacity	1%	§60.472(d)
EP 8-5	Line 1 Backsurfacing Silo with Bin Vent	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-5	Line 1 Backsurfacing Silo with Bin Vent	Opacity	1%	§60.472(d)
EP 8-6	Line 1 Backsurfacing Receiving Silo with Bin Vent	PM	$E = 3.59(P)^{0.62}$ or $E = 17.31(P)^{0.16}$	Rule 335-3-4-.04
EP 8-6	Line 1 Backsurfacing Receiving Silo with Bin Vent	Opacity	1%	§60.472(d)

Provisos for Line 1 Granule Handling and Storage

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. This source is subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 60 Subpart UU
3. For particulate matter emissions, these sources are subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64
Emission Standards	
1. These units shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d)
2. Particulate matter emissions from these units shall not exceed the allowable set by Rule 335-3-4-.04.	Rule 335-3-4-.04
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64
2. The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
3. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this	Rule 335-3-16-.05(c)

	Federally Enforceable Provisos	Regulations
	Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Shingle Manufacturing Line 2

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 2-1	Asphalt Coater, Horizontal Mixer, Surge Tank, Sealant Applicator, Sealant Use Tank, Adhesive Applicator, Adhesive Mixture Tank, Two (2) 100,000 Gallon Asphalt Storage Tanks, and Two (2) 15,000 Gallon Sealant and Adhesive Storage Tanks controlled by common HVAF	PM	0.06 lb/ton of asphalt shingles produced	§63.11561(b), Table 2
EP 2-1	Asphalt Coater, Horizontal Mixer, Surge Tank, Sealant Applicator, Sealant Use Tank, Adhesive Applicator, Adhesive Mixture Tank, Two (2) 100,000 Gallon Asphalt Storage Tanks, and Two (2) 15,000 Gallon Sealant and Adhesive Storage Tanks controlled by common HVAF	Opacity	20%	§60.472(a)(2)
EP 2-2	Granule Application System and Filler Heater with Baghouse	PM	9.24 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 2-2	Granule Application System and Filler Heater with Baghouse	Opacity	See General Provisos	Rule 335-3-4-.01(1)
Tanks	Two (2) 100,000 Gallon Asphalt Storage Tanks, and Two (2) 15,000 Gallon Sealant and Adhesive Storage Tanks	Opacity	0%	§60.472(c)

Provisos for Shingle Manufacturing Line 2

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2.	The Granule Application System and Filler Heater with Baghouse (EP 2-2) has enforceable limits in place in order to prevent it from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-1-.04 (Anti-PSD)
3.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 60 Subpart UU
4.	These sources are subject to the applicable requirements of 40 CFR 63, Subpart AAAAAAA, "National Emissions Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing".	40 CFR Part 63 Subpart AAAAAAA
5.	For particulate matter emissions, the Granule Application System and Filler Heater with Baghouse (EP 2-2) is subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64
Emission Standards		
1.	The exhaust gases from the Asphalt Coater (EP 2-1) shall not exceed an opacity greater than 20%.	40 CFR §60.472(a)(2)
2.	The Asphalt Coater capture system shall not discharge any visible emission for more than 20 percent of any period of consecutive valid observations totaling 60 minutes.	40 CFR §60.472(a)(3)
3.	The exhaust gases from any asphalt storage tank shall not exceed an opacity greater than 0%, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank are ducted to a control device for a saturator/coater, the combined emissions shall meet the emission limit contained in 40 CFR 60 Subpart UU, §60.472(a) during the time the saturator/coater control device is operating. At any other time the asphalt storage tanks must meet the opacity limit specified above for storage tanks.	40 CFR §60.472(c)
4.	Particulate Matter emissions from the Asphalt Coater (EP 2-1) shall not exceed 0.06 lb/ton of asphalt shingles produced.	40 CFR §63.11561(b), Table 2

Federally Enforceable Provisos		Regulations
5.	Particulate Matter emissions from the Granule Application System and Filler Heater (EP 2-2) shall not exceed 9.24 lbs/hr.	Rule 335-3-1-.04 (Anti-PSD)
Compliance and Performance Test Methods and Procedures		
1.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3.	Method 18 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of PAH emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64
2.	The inlet temperature of the HVAF (EP 2-1) shall be continuously monitored and recorded. The monitoring device shall have an accuracy of plus or minus 15 degrees Celsius over its range.	40 CFR §60.473
3.	The Permittee must install, operate, and maintain a continuous parameter monitoring system as specified in §63.11563(c), §63.11563(d), and §63.11563(e).	40 CFR §63.11563(c), §63.11563(d), & §63.11563(e)
4.	The Permittee shall continuously (at least once every 15 minutes) monitor the HVAF inlet temperature and pressure differential. The HVAF inlet temperature and pressure differential shall be reduced to 3-hour averages. The 3-hour averages shall be less than the 3-hour average established in the most recent compliance test. Corrective action must be performed within (2) two hours if the HVAF inlet temperature and pressure differential exceed the limits established in the most recent compliance test. Any repairs or observed problems shall be recorded.	40 CFR §63.11563(a), Table 4
5.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If visible emissions in excess of 15% opacity are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
6.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the	Rule 335-3-16-.05(c)

	Federally Enforceable Provisos	Regulations
	requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all inlet temperature of the HVAF readings. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)
4.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Line 2 Filler Handling System

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 3-1	1,440 Ton Filler Silo with Baghouse	PM	0.54 lbs/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 3-1	1,440 Ton Filler Silo with Baghouse	Opacity	1%	§60.472(d)
EP 3-2	30 Ton Filler Receiving Bin with Baghouse	PM	0.37 lbs/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 3-2	30 Ton Filler Receiving Bin with Baghouse	Opacity	1%	§60.472(d)

Provisos for Line 2 Filler Handling System

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
3.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 63 Subpart UU
Emission Standards		
1.	These units shall not discharge into the atmosphere emissions with opacity greater than 1%.	§60.472(d)
2.	Particulate matter emissions from the 1440 ton Filler Silo (EP 3-1) shall not exceed 0.54 lb/hr.	Rule 335-3-14-.04 (Anti-PSD)
3.	Particulate matter emissions from the 30 ton Filler Receiving Bin (EP 3-2) shall not exceed 0.37 lb/hr.	Rule 335-3-14-.04 (Anti-PSD)
Compliance and Performance Test Methods and Procedures		
1.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
2.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)

Federally Enforceable Provisos		Regulations
3.	A properly maintained and operated device shall be utilized to measure the pressure differential between the inlet and exhaust of each baghouse to determine if the pressure differential is within the manufacturer's recommended operating range. The pressure differentials shall be checked on at least a weekly basis. Whenever the pressure differential is outside the manufacturer's recommended range, maintenance inspections and/or corrective action to bring the pressure differential within the manufacturer's recommended range are to be initiated within two hours.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-16-.05(c)
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Line 2 Granule Handling and Storage

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
EP 4-1	Line 2 Granule Storage Transfer Points and 24 Storage Silos with Baghouse	PM	1.30 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 4-1	Line 2 Granule Storage Transfer Points and 24 Storage Silos with Baghouse	Opacity	1%	§60.472(d)
EP 4-2	Line 2 Butt Granule Unloading and Transfer Points with Baghouse	PM	0.82 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 4-2	Line 2 Butt Granule Unloading and Transfer Points with Baghouse	Opacity	1%	§60.472(d)
EP 4-3	Line 2 Headlap/Backsurfacing Unloading and Transfer Points with Baghouse	PM	0.82 lb/hr	Rule 335-3-14-.04 (Anti-PSD)
EP 4-3	Line 2 Headlap/Backsurfacing Unloading and Transfer Points with Baghouse	Opacity	1%	§60.472(d)

Provisos for Line 2 Granule Handling and Storage

Federally Enforceable Provisos		Regulations
Applicability		
1.	These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2.	These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
3.	These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 60 Subpart UU
4.	For particulate matter emissions, these sources are subject to the applicable requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", to include General Proviso # 33.	40 CFR Part 64
Emission Standards		
1.	These units shall not discharge into the atmosphere emissions with opacity greater than 1%.	40 CFR §60.472(d)
2.	Particulate Matter emissions from the Line 2 Granule Storage Transfer Points and 24 Storage Silos with Baghouse (EP 4-1) shall not exceed 1.30 lbs/hr.	Rule 335-3-14-.04 (Anti-PSD)
3.	Particulate Matter emissions from the Line 2 Butt Granule Unloading and Transfer Points with Baghouse (EP 4-2) shall not exceed 0.82 lbs/hr.	Rule 335-3-14-.04 (Anti-PSD)
4.	Particulate Matter emissions from the Line 2 Headlap/BackSurfacing Unloading and Transfer Points with Baghouse (EP 4-3) shall not exceed 0.82 lbs/hr.	Rule 335-3-14-.04 (Anti-PSD)
Compliance and Performance Test Methods and Procedures		
1.	Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2.	Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
Emission Monitoring		
1.	Reference the Appendix for the monitoring requirements for 40 CFR Part 64, "Compliance Assurance Monitoring".	40 CFR Part 64

Federally Enforceable Provisos		Regulations
2.	The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9. If any visible emissions are noted, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
3.	After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced.	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements		
1.	The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	Rule 335-3-16-.05(c)
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)
3.	The Permittee shall maintain a record of all differential pressure readings performed. This shall include all problems observed, excursions, and corrective actions taken. Each record shall be maintained for a period of 5 years.	Rule 335-3-16-.05(c)

Summary Page for Heat Transfer Fluid Heating System

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	PM	$E=1.38H^{-0.44}$	Rule 335-3-4-.03
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	SO_2	See General Provisos	Rule 335-3-5-.01(b)
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	NO_X	N/A	N/A
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	CO	N/A	N/A
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	VOC	N/A	N/A
HTF	Heat Transfer Fluid Heating System including Three (3) 6MMBtu/hr Heaters	Opacity	See General Provisos	Rule 335-3-4-.01(1)

Provisos for Heat Transfer Fluid Heating System

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources have enforceable limits in place in order to prevent them from being subject to the provisions of ADEM Admin. Code r. 335-3-14-.04 "Air Permits Authorizing Construction in Clean Air Areas [Prevention of Significant Deterioration]".	Rule 335-3-14-.04 (Anti-PSD)
Emission Standards	
1. These units shall combust natural gas only.	Rule 335-3-14-.04 (Anti-PSD)
2. Particulate matter emissions from each boiler shall not exceed the allowable set by Rule 335-3-4-.03(1).	Rule 335-3-4-.03(1)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
2. Method 5 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of particulate matter emissions.	Rule 335-3-1-.05
3. Method 6 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of sulfur dioxide emissions.	Rule 335-3-1-.05
Emission Monitoring	
1. This source is subject to no additional specific requirements other than those listed in the General Provisos.	N/A
Recordkeeping and Reporting Requirements	
1. This source is subject to no additional specific requirements other than those listed in the General Provisos.	N/A

Summary Page for Storage Tanks

Permitted
Operating Schedule: 24 Hrs/day x 7 Days/week x 52 Weeks/yr = 8760 Hrs/yr

Emission limitations:

Emission Point #	Description	Pollutant	Emission limit	Regulation
Tank 4	22,600 Gallon Coating Asphalt Still #4	VOC	N/A	N/A
Tank 4	22,600 Gallon Coating Asphalt Still #4	Opacity	See General Provisos	Rule 335-3-4-.01(1)
Tank 6	13,600 Gallon Sealant Still #6 vented to the tank heater air intake	VOC	N/A	N/A
Tank 6	13,600 Gallon Sealant Still #6 vented to the tank heater air intake	Opacity	0%	§60.472(c)
Tank 8	25,000 Gallon Asphalt Flux Still #8 vented to the tank heater air intake	VOC	N/A	N/A
Tank 8	25,000 Gallon Asphalt Flux Still #8 vented to the tank heater air intake	Opacity	0%	§60.472(c)
EP 9-1	1,200 Gallon Laminant Blend Tank & 1,200 Gallon Filled Asphalt Surge Tank	VOC	N/A	N/A
EP 9-1	1,200 Gallon Laminant Blend Tank & 1,200 Gallon Filled Asphalt Surge Tank	Opacity	0%	§60.472(c)

Provisos for Storage Tanks

Federally Enforceable Provisos	Regulations
Applicability	
1. These sources are subject to the applicable requirements of ADEM Admin. Code r. 335-3-16-.03, "Major Source Operating Permits".	Rule 335-3-16-.03
2. These sources are subject to the applicable requirements of 40 CFR 60 Subpart UU, "Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture".	40 CFR Part 60 Subpart UU
Emission Standards	
1. The exhaust gases from Tank 6, Tank 8, and EP 9-1 shall not exceed an opacity greater than 0%, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. If, however, the emissions from any asphalt storage tank are ducted to a control device for a saturator/coater, the combined emissions shall meet the emission limit contained in 40 CFR 60 Subpart UU, §60.472(a) during the time the saturator/coater control device is operating. At any other time the asphalt storage tanks must meet the opacity limit specified above for storage tanks.	40 CFR §60.472(c)
Compliance and Performance Test Methods and Procedures	
1. Method 9 of 40 CFR Part 60 (latest edition), Appendix A shall be used in the determination of opacity.	Rule 335-3-1-.05
Emission Monitoring	
1. The Permittee shall perform a visual check, at least once per week, of the stacks associated with these units. This check shall be performed by a person familiar with Method 9.	Rule 335-3-16-.05(c)
2. If visible emissions in excess of 15% are noted from Tank 4, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
3. If any visible emissions are observed from Tank 6, Tank 8, or EP 9-1, maintenance inspections and/or corrective action to reduce the visible emission are to be initiated within two (2) hours. Any repairs of observed problems shall be recorded.	Rule 335-3-16-.05(c)
4. After the corrective action has been performed, the permittee shall conduct another visual check to ensure that the visible emissions have been reduced	Rule 335-3-16-.05(c)
Recordkeeping and Reporting Requirements	
1. The Permittee shall maintain a record of all inspections, to include visible observations performed to satisfy the	Rule 335-3-16-.05(c)

Federally Enforceable Provisos		Regulations
	requirements of the Emission Monitoring section of this Permit. This shall include problems observed and corrective actions taken. The records shall be retained for at least five (5) years from the date of generation and shall be available upon request.	
2.	The Permittee shall submit a written report of exceedance of the stack opacity to the Department semi-annually.	Rule 335-3-16-.05(c)

Appendix CAM

Compliance Plan for EP 7-3 (Rotary Kiln with 4.7 MMBtu/hr Burner Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-1 (Line 1 Truck Unloading Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-2 (Line 1 Truck Bucket Elevator Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-3 (Line 1 Railcar Bucket Elevator Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-4 (Line 1 Headlap Silo Bin Vent)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-5 (Line 1 Backsurfacing Silo Bin Vent)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 8-6 (Line 1 Backsurfacing Receiving Silo Bin Vent)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 2-2 (Granule Application System and Filler Heater Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 4-1 (Line 2 Granule Storage Transfer Points and 24 Storage Silo Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 4-2 (Line 2 Butt Granule Unloading and Transfer Points Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous

Compliance Plan for EP 4-3 (Line 2 Headlap/Backsurfacing Unloading and Transfer Points Baghouse)

	Indicator 1
I. Indicator	Pressure Differential
Measurement Approach	Pressure Gauge
II. Indicator Range	While the unit is operating, an excursion is defined as a pressure differential less than 0.15 inches of H_20 or greater than 8 inches of H_20. Excursions trigger an inspection, corrective action, and a reporting requirement.
III. Performance Criteria	
A. Data Representativeness	The pressure differential is being measured between the inlet and outlet of the baghouse.
B. Verification of Operation Status	Not Applicable
C. QA/QC Practices and Criteria	The pressure gauge will be calibrated and maintained per the manufacturer's recommendation.
D. Monitoring Frequency	Once daily during operation
E. Data Collection Procedures	The pressure differential will be recorded with date and time.
F. Averaging Period	Instantaneous